

EXHIBIT B-2

CLASS NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Prutsman, et al. v. Nonstop Administration and Insurance Services, Inc.

Case No. 3:23-cv-01131-RFL

United States District Court for the Northern District of California

PLEASE READ THIS NOTICE CAREFULLY AS YOUR LEGAL RIGHTS MAY BE AFFECTED. A CLASS ACTION SETTLEMENT HAS BEEN REACHED UNDER WHICH YOU MAY BE ENTITLED TO A PAYMENT OR OTHER RELIEF.

*This is a Court-authorized Class Notice of a proposed class action Settlement. This is not a solicitation from a lawyer and is **not** notice of a lawsuit against you.*

This notice summarizes the proposed settlement. For the precise terms of the settlement, please see the settlement agreement available at www._____.com, by contacting class counsel at 555 12th Street, Suite 2100 Oakland, California 94607 (Cole & Van Note) or 227 W Monroe Street, Suite 2100 Chicago, Illinois 60606 (Milberg Coleman Bryson Phillips Grossman, PLLC), by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, San Francisco Courthouse, 450 Golden Gate Ave., 16th floor, San Francisco, CA 94102, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

What is this lawsuit about? This is a Court-authorized Class Notice of a proposed Settlement in a class action lawsuit, *Prutsman, et al. v. Nonstop Administration and Insurance Services, Inc.*, Case No. 3:23-cv-01131-RFL ("Action"), pending in the United States District Court for the Northern District of California. The Settlement will resolve a lawsuit brought on behalf of persons who allege Nonstop Administration and Insurance Services, Inc. ("Defendants" or "Nonstop") committed negligence and other legal violations in connection with a December 22, 2022, Data Breach and was announced by Nonstop on or about February 3, 2023. Nonstop denies these allegations, denies violations of any law, and denies all liability.

Who is a Class Member?

All individuals within the United States of America whose PHI/PII was exposed to unauthorized third parties as a result of the Data Breach discovered by Defendant on or about December 22, 2022.

What are the benefits? The Settlement provides the following benefits, subject to an aggregate cap on claims:

- **Compensation for Out-of-Pocket Losses:** All Class Members may submit a claim for Out-of-Pocket Losses up to five thousand dollars (\$5000) per individual. Defendant will pay valid and timely submitted claims for the following: unreimbursed costs, expenses or charges incurred addressing or remedying identity theft, fraud, or misuse of personal information and/or other issues reasonably traceable to the Data Breach upon submission of an Approved Claim and supporting third-party documentation.

- **Alternative Cash Payment:** All Class Members may claim an alternative cash payment in an amount estimated to be approximately fifty dollars (\$50) by submitting a timely and valid Claim Form.
- **California Statutory Claim Payments:** Class Members who were residents of California at any time from December 22, 2022, to February 12, 2025 (“California Subclass Members”) can submit a claim for a California Statutory Payment of \$100 for their statutory claims under the California Consumer Privacy Act in addition to the reimbursement for Out-of-Pocket Losses and alternative cash payment.

How to file a claim. You must file a Claim Form by mail postmarked by February 12, 2025, and mailed to the Settlement Administrator’s address below, or online at www.website.com by February 12, 2025 to receive compensation from the Settlement.

What are my other rights?

- **Do Nothing:** If you do nothing, you remain in the Settlement. You give your rights to sue but you will not get any compensation as a Class Member.
- **Exclude Yourself:** You can get out of the Settlement and keep your right to sue about the claims in this Action, but you will not get any compensation from the Settlement. You must submit a Request for Exclusion to the Settlement Administrator by January 13, 2025.
- **Object:** You can stay in the Settlement but tell the Court why you think the Settlement should not be approved. Your written objection must be submitted by January 13, 2025. Detailed instructions on how to file a Claim Form, exclude yourself, or object can be found on the Class Notice found on the Settlement Website.
- **Attend a hearing:** The Court will hold the Final Approval Hearing on March 18, 2025 at 1:30 p.m. ~~a.m.~~ PT, to consider whether the proposed Settlement is fair, reasonable, and adequate, to consider Plaintiff’s Counsel’s Fees and Expenses amount for attorneys’ fees and costs not to exceed \$5333,333.33 plus reasonable expenses, and request a Service Award of \$2,500 for each Class Representative, and to consider whether and if it should be approved. You may, but are not required to, appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. You can also access the hearing via Zoom (see the Public Hearings link and instructions at <https://cand.uscourts.gov/judges/lin-rita-f-rfl/>).

This is only a summary. For additional information, including the aggregate cap on claims, a copy of the Settlement Agreement and other documents, visit the Documents section of the Settlement Website or call [\(XXX\) XXX-XXXX](tel:(XXX) XXX-XXXX). You may also contact the Settlement Administrator to update your address or contact information at <Nonstop Data Breach>, c/o Kroll Settlement Administration LLC, PO Box [XXXX](#), New York, NY 10150-[XXXX](#).